

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact Upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

To: Office of the Secretary  
Attn: The Commission

**COMMENTS OF JACKSON TELEVISION, LLC**

Jackson Television, LLC ("Jackson"), the permittee of digital television station WDBD-DT, Jackson, Mississippi, by its attorneys and pursuant to Section 1.415 of the Commission's rules, hereby submits these comments in response to the Commission's Seventh Further Notice of Proposed Rulemaking ("Seventh FNPRM"), FCC 06-150 (released October 20, 2006), to respectfully request that the FCC change WDBD-DT's channel allotment for post-transition digital television ("DTV") operations from Channel 41 to Channel 40.

In the proposed DTV Table of Allotments contained in Appendices A and B to the Seventh FNPRM, the Commission has specified DTV Channel 41 as WDBD-DT's post-transition channel assignment. Paragraph 16 of the Seventh FNPRM, however, requests that "licensees review the accuracy of their information contained in the proposed DTV Table and Appendix B, . . . and comment on any inaccuracies or discrepancies." Upon review of the proposed DTV Table and Appendix B, Jackson has determined that, due to technological changes that have taken place since its first round channel election as well as to digital operations

implemented by other television stations, digital operation on its current NTSC Channel, Channel 40, would better serve the public interest. Accordingly, Jackson requests that the final DTV Table specify Channel 40, in lieu of Channel 41, as WDBD(TV)'s post-transition DTV channel.

When Jackson made its original channel election, it sought to implement an economically viable operation consistent with the state of digital transmission technology at the time. Jackson selected its channel based its knowledge of the DTV equipment which had already been installed when it purchased WDBD(TV) and of the technology at the time. Since that time, however, it has become clear from experience in operating WDBD-DT that the equipment would perform much better on Channel 40 than on Channel 41. An issue of overheating of the necessary filter for operation on Channel 41 also has arisen and would likely become critical at full-power operation on that channel. Thus, additional equipment and engineering steps would be required for a permanent, full-power operations on DTV Channel 41, and these considerations have made it far more economical for WDBD(TV) to remain on its NTSC channel in the digital environment. Operation on Channel 40 will result in significant cost savings to the station, which, in turn, will enable Jackson to devote more of its resources to improved service to the public.

Furthermore, since Jackson made its original channel election, other stations have also made their elections and, in many cases, commenced digital operation with fully authorized or at least relatively high power facilities. After evaluating these new digital services, Jackson has determined that continued operation on Channel 40 will permit WDBD-DT to eliminate interference that would otherwise be caused by the station's operation on Channel 41.<sup>1</sup>

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<sup>1</sup> Jackson notes that WDBD-DT's operation on Channel 41 will cause *de minimis* interference to  
(Continued...)

Appended hereto as Attachment 1 is an engineering statement demonstrating that DTV Channel 40 is an acceptable channel assignment for WDBD-DT's post-transition digital operations. Clearly, therefore, allowing WDBD-DT to remain on Channel 40 would serve the public interest by eliminating interference. The reduction of interference would be of particular benefit at the time of conversion to all-DTV operations, as members of the public are adopting the new technology and attempting to become adjusted to an all-digital world. At that point, the need for consumers to deal with interference issues would be a detriment to the overall DTV transition, whereas removing such potential problems would be a definite benefit.

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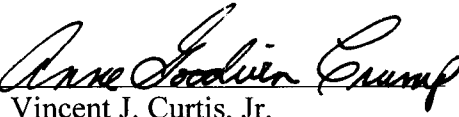
(...Continued)

three stations: 0.03% interference to KBCA-DT; Alexandria, LA; 0.07% interference to WBUY-DT, Holly Springs, MS; and 0.04% interference to WEIQ-DT, Mobile, AL. WDBD-DT's operations on DTV Channel 40, as proposed herein, will cause no interference whatsoever to any other station. As noted in the attached engineering statement, the public interest would be served by allowing Jackson to revise its election now, rather than requiring Jackson to file a post-transition rulemaking petition and recurring requests for continued authority to operate its DTV facility on Channel 40.

Accordingly, Jackson respectfully requests that the Commission's DTV Table of Allotments be modified to assign DTV Channel 40 to WDBD-DT for its post-transition digital television operations.

Respectfully submitted,

**JACKSON TELEVISION, LLC**

By:   
Vincent J. Curtis, Jr.  
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January 25, 2006

## **DTV Station WDBD-DT • TCD Channel D41 • Jackson, Mississippi**

### **Statement of Hammett & Edison, Inc., Consulting Engineers**

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of Jackson Television, L.L.C., licensee of Stations WDBD(TV) and WDBD-DT, Channels N40 and D41, Jackson, Mississippi, to prepare an engineering statement in support of its comments to the Commission's Seventh Further Notice of Proposed Rule Making in MB Docket No. 87-268.

### **Background**

In the Seventh Further Notice of Proposed Rule Making (7FNPRM) in MB Docket No. 87-268, the Commission proposed DTV Channel 41 as the post-transition Channel for WDBD-DT. When Jackson Television, L.L.C. ("Jackson") completed its Digital Channel Election (First Round, FCC Form 382), it elected Channel 41 for DTV operation post-transition. Because of changed circumstances, Jackson seeks to change its post-transition election to Channel 40.

### **No Interference Caused By Operation on Channel D40**

A post-transition channel conflict study was conducted assuming WDBD-DT to be operating on its tentatively designated channel (TCD41), using the facilities specified in the 7FNPRM. Small amounts of interference were predicted to three stations: KBCA-DT, TCD41, Alexandria, LA (0.03% of baseline), WBUY-DT, TCD41, Holly Springs, MS, (0.07% of baseline), and WEIQ-DT, TCD41, Mobile, AL (0.04% of baseline). Thus, the operation proposed by the Commission causes some interference to other stations.

Post-transition channel conflict studies were then conducted assuming WDBD-DT to be operating directionally (using the same directional antenna pattern certified for use on TCD Channel 41)\* at 1,000 kilowatts. As shown in Figure 1, attached, post-transition channel conflict studies show that no interference from WDBD-DT as Channel D40 would be caused to any station. Thus, operation on Channel D40 *eliminates completely* the predicted interference to other stations. Furthermore, the post-transition interference-limited coverage of WDBD-DT on Channel D40 is within 0.55% of that on Channel D41.

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\* The existing channel 40 antenna, Andrew Model ATW28H3-HST1-40H, has an azimuth pattern identical to that specified in the channel 41 tentative channel designation, which is Andrew Model ATW30H4-HST1-41S.

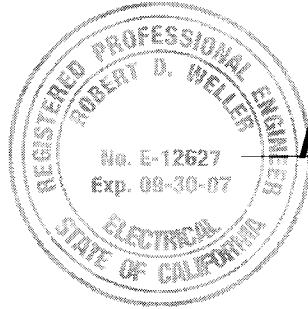


**DTV Station WDBD-DT • TCD Channel D41 • Jackson, Mississippi**

**List of Figures**

In carrying out these engineering studies, the following attached figure was prepared under my direct supervision:

1. Channel selection study for WDBD-DT as D40.



*/s/ Robert D. Weller*  
Robert D. Weller, P.E.

January 24, 2007



**HAMMETT & EDISON, INC.**  
CONSULTING ENGINEERS  
SAN FRANCISCO

# Station WDBD-DT • TCD Channel D41 • Jackson, Mississippi

## Results of OET-69 Channel Conflict Study WDBD-DT at 1,000 kW ERP (Maximum DA) • DTV Channel 40

OET-69 Interference Analysis, 2000 Census  
tvstudy v3.2.12

Channel-election conflict study, in-core only, DTV protection only

Default emission mask for digital Class A and LPTV/translator records: simple

Station parameters:

```
--Modified-----
Station: D40 WDBD TCD
City: JACKSON, MS
Facility ID: 71326
Coordinates: N 32-12-49.0
              W 90-22-56.0
Height AMSL: 690.0 m
Maximum ERP: 1000 kW
Azimuth pattern: AND-ATW28H3-HST1-40H
Orientation: 330.0
Elevation pattern: OET-69 generic
Service level: 41.2 dBu
```

Protected station	Base Pop	Before		After		%Chng
		IX Change	%Base	IX Change	%Base	
D40 KBTW-TV TCD PORT ARTHUR, TX	776,374	-252	-0.0	-252	-0.0	0.00

Interfering station	Before		After	
	Total IX	Unique IX	Total IX	Unique IX
D40 WDBD TCD* JACKSON, MS	0	0	0	0
D40 KXTX-TV LIC DALLAS, TX	0	0	0	0
D40 WNOL-TV CP NEW ORLEANS, LA	0	0	0	0
D40 A KHPL-CA CP LAGRANGE, TX	0	0	0	0
D40 A KHPM-CA CP SAN MARCOS, TX	0	0	0	0
D41 KAZH CP BAYTOWN, TX	0	0	0	0
N39- KHCW LIC HOUSTON, TX	0	0	0	0
N40+A KXLK-CA LIC AUSTIN, TX	0	0	0	0
N40-A KRHD-LP LIC BRYAN, TX	0	0	0	0
N40zA KAJN-LP LIC LAFAYETTE, LA	1	1	1	1

Protected station	Base Pop	Before		After		%Chng
		IX Change	%Base	IX Change	%Base	
D40 WPAN TCD FORT WALTON BEA, FL	581,775	-36	-0.0	-36	-0.0	0.00

Interfering station	Before		After	
	Total IX	Unique IX	Total IX	Unique IX
D40 WDBD TCD* JACKSON, MS	0	0	0	0
D40 WNOL-TV CP NEW ORLEANS, LA	0	0	0	0
D41 WEIQ LIC MOBILE, AL	330	330	330	330
N40- WJSU-TV LIC ANNISTON, AL	0	0	0	0



**HAMMETT & EDISON, INC.**  
CONSULTING ENGINEERS  
SAN FRANCISCO

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Figure 1A

# Station WDBD-DT • TCD Channel D41 • Jackson, Mississippi

## Results of OET-69 Channel Conflict Study WDBD-DT at 1,000 kW ERP (Maximum DA) • DTV Channel 40

Protected station	Base Pop	Before		After		%Chng
		IX Change	%Base	IX Change	%Base	
N26+A W26BB LIC VICKSBURG, MS	48,063	0	0.0	0	0.0	0.00

Interfering station	Before		After	
	Total IX	Unique IX	Total IX	Unique IX
D40 WDBD TCD* JACKSON, MS	0	0	0	0
D25 WMAO-TV CP GREENWOOD, MS	0	0	0	0
D26 KLPA-TV LIC ALEXANDRIA, LA	0	0	0	0
D26 WMDN CP MERIDIAN, MS	0	0	0	0
D41 WDBD CP JACKSON, MS	0	0	0	0
N26-L K26EV LIC RAYVILLE, LA	0	0	0	0
N26zL W26BR CP MERIDIAN, MS	0	0	0	0
N27zL W27CX LIC NATCHEZ, MS	0	0	0	0

Protected station	Base Pop	Before		After		%Chng
		IX Change	%Base	IX Change	%Base	
N40zA KAJN-LP LIC LAFAYETTE, LA	346,568	0	0.0	0	0.0	0.00

Interfering station	Before		After	
	Total IX	Unique IX	Total IX	Unique IX
D40 WDBD TCD* JACKSON, MS	0	0	0	0
D32 L KLFT-LP CP LAFAYETTE, LA	0	0	0	0
D39 L K50FI CP OPELOUSAS, LA	0	0	0	0
D40 KBTB-TV CP PORT ARTHUR, TX	0	0	0	0
D40 WNOL-TV CP NEW ORLEANS, LA	0	0	0	0
D42 L K69HD CP CHURCH POINT, LA	0	0	0	0
N39zA KWBK-LP LIC MORGAN CITY, LA	0	0	0	0
N41-A KBTR-CA LIC BATON ROUGE, LA	0	0	0	0
N55nL K54FT LIC NEW IBERIA, LA	0	0	0	0
N55zL K55GT LIC ALEXANDRIA, LA	0	0	0	0

\* Record parameters modified

### Note:

The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.



**HAMMETT & EDISON, INC.**  
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Figure 1B